

**NINE-POINT CRITERIA ANALYSIS  
OF  
PROPOSED BUILDING STANDARDS  
OF THE  
[STATE AGENCY NAME]**

**REGARDING THE [CODE NAME]  
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART [PART NUMBER]**

Building standards submitted to the California Building Standards Commission for approval are required, by Health and Safety Code Subsection 18930(a), to be accompanied by an analysis which will, to the satisfaction of the Commission, justify their approval. The approval of these proposed building standards is justified as follows:

**1) The proposed building standards do not conflict with, overlap, or duplicate other building standards.**

[Insert justification analysis]

**2) The proposed building standards are within the parameters established by enabling legislation, and are not expressly within the exclusive jurisdiction of another agency.**

[Insert justification analysis]

**3) The public interest requires the adoption of the building standards.**

[Insert justification analysis]

**4) The proposed building standards are not unreasonable, arbitrary, unfair, or capricious, in whole or in part.**

[Insert justification analysis]

**5) The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.**

[Insert justification analysis]

**6) The proposed building standards are not unnecessarily ambiguous or vague, in whole or in part.**

[Insert justification analysis]

**7) *The applicable national specifications, published standards, and model codes have been incorporated therein as provided in this part, where appropriate.*** (Health and Safety Code

*Section 18938 requires a statement of inadequacy of a national specification, published standard, or model code if it does not adequately address the goals of the state agency, OR a statement informing the Commission that no national specification, published standard, or model code that is relevant to the proposed building standards exists.)*

[Insert inadequacy statement OR nonexistence statement]

**8) The format of the proposed building standards is consistent with that adopted by the Commission.**

[Insert justification analysis]

**9) The proposed building standards, if they promote fire and panic safety as determined by the State Fire Marshal, have the written approval of the State Fire Marshal.**

[Insert justification analysis]